

## REMARKS

Claim 7 calls for a system which overcomes a problem in that when a metallic precursor is situated over a semiconductor substrate and then oxidized by conventional techniques, an oxide layer forms between the metallic precursor and the substrate. Nothing that has been cited to date in any way intimates any solution to the problem, much less the recognition of such a problem.

The cited reference to Mizutani cannot possibly suggest a solution to such a problem since Mizutani has nothing to do with forming a metallic precursor on a semiconductor substrate. Instead, Mizutani teaches a non-semiconductor substrate that simply would not oxidize. Therefore, Mizutani neither faced nor recognized the problem solved by the present application.

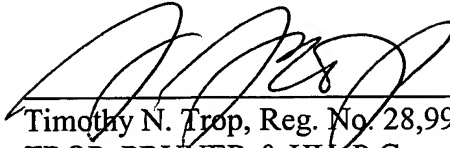
The cited reference to Adan similarly never faces the problem. Since Adan never teaches a metallic precursor on a semiconductor substrate, he does not have the problem. Since he does not have the problem, he cannot possibly contemplate the solution.

It is admitted in the office action that Adan does not teach forming the oxide layers by a method comprising forming a metallic precursor and then oxidizing said metallic precursor in a liquid oxidizer. However, it is suggested that it would be obvious to a person of ordinary skill in the art at the time the invention was made to form Adan's oxide layers by Mizutani's method. But, even if one did that, one still would not reach the claimed invention. That is because the oxide layers in Adan separate the semiconductor substrate from the gate 6a. Because Adan never is faced with a situation with a metal gate or metallic precursor on the substrate, he can use any technique Mizutani suggests and still not reach the claimed invention. In other words, if Adan was to form his layer 2a by some type of liquid oxidizer, he would have had to have put the metallic precursor on the substrate first. But, plainly, given the thickness of the layer 2a and the description of how it is done, this is not what happened. For example, in column 4, lines 39-42, it is explained that an insulating silicon oxide layer about .5 microns in thickness is grown or deposited and a bottom gate electrode is patterned. It is evident that the oxide is formed first and then the metallic precursor or metallic gate is then deposited. There is no situation where a metallic precursor is formed directly on the semiconductor substrate. In fact, neither reference teaches depositing a metallic precursor directly on a substrate. Thus, the combination of the two references still cannot possibly reach the claimed invention.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

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